

EXHIBIT 1

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CAITLIN O'CONNOR,)	
)	Case No. 3:20-cv-00628
Plaintiff,)	
)	District Judge Richardson
v.)	
)	Magistrate Judge Frensley
THE LAMPO GROUP, LLC a/k/a)	
RAMSEY SOLUTIONS,)	Jury Demand
)	
Defendant.)	

**PLAINTIFF'S AMENDED RESPONSES TO DEFENDANT'S FIRST SET OF
INTERROGATORIES**

Comes Now, Plaintiff, to respond and object to Defendant's First Set of Interrogatories as follows:

INTERROGATORIES

14. Explain the factual basis for Plaintiff's claim that Defendant terminated her employment based on pregnancy.

ANSWER: See interrogatory no. 11.

AMENDED: Plaintiff informed Defendant she was pregnant, and she was immediately terminated after this disclosure. Soon her disclosure, Plaintiff was contacted by management to discuss various aspects of her pregnancy. During this time, Defendant's Human Resources Committee and Dave Ramsey exchanged a series of emails regarding Plaintiff's pregnancy. Mr. Floyd stated that Plaintiff was "classless," and Mr. Ramsey stated Plaintiff was "scared and embarrassed" about her pregnancy. Plaintiff was allegedly terminated due to a violation of Defendant's policy against engaging in premarital sex, a violation which Defendant was only aware of due to Plaintiff's disclosure of her pregnancy.

Respectfully submitted,

/s/ Heather Moore Collins
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CERTIFICATE OF SERVICE

I certify that, on November 18, 2021, a copy of the foregoing document was sent by e-mail to:

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